

THE  
ROTH LAW FIRM  
PLLC

April 18, 2024

**VIA ECF**

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street, 14A  
New York, NY 10007-1312

**Re: *Kunstler, Hrbek, Goetz and Glass v. The Central Intelligence Agency,  
Pompeo, Morales and Undercover Global S.L., 22 Cv. 6913***

Dear Judge Koeltl:

We write respectfully on behalf of plaintiffs Kunstler, Hrbek, Goetz and Glass (collectively, “Plaintiffs”) as well as, defendant the Central Intelligence Agency (“CIA”), to request additional time and set forth the briefing schedule for the CIA’s motion to dismiss based on its assertion of the state secrets privilege, filed on April 15, 2024. Dkt. Nos. 85-88.

Plaintiffs respectfully request an extension to May 24, 2024 to file an opposition to the CIA’s motion to dismiss. The current deadline for Plaintiffs to oppose the motion is April 29, 2024. The additional time is necessary and requested due to Plaintiffs’ counsel’s observance of Passover and scheduled vacations, as well as the complexity of the issues raised and the office’s workload.

Defendant CIA similarly requests that its deadline to file a reply brief be pushed back to Friday June 14, 2024.

We thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'R. Roth', with a long horizontal flourish extending to the right.

Richard A. Roth, Esq.